

Robert J. Nelson (State Bar No. 132797)
Lexi Hazam (State Bar No. 224457)
Andrew Kingsdale (State Bar No. 255669)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415.956.1000
Facsimile: 415.956.1008

Michael D. Thamer (State Bar No. 101440)
LAW OFFICES OF MICHAEL D. THAMER
Old Callahan School House
12444 South Highway 3
Post Office Box 1568
Callahan, CA 96014-1568
Telephone: (530) 467-5307
Facsimile: (530) 467-5437

Kathryn A. Stebner (State Bar No. 121088)
Sarah Colby (State Bar No. 194475)
STEBNER & ASSOCIATES
870 Market Street, Suite 1212
San Francisco, CA 94102-2907
Telephone: (415) 362-9800
Facsimile: (415) 362-9801

[Additional Counsel Appear on Signature Page]

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Phyllis Wehlage, on her behalf and on
behalf of others similarly situated,

Plaintiffs,

v.

EmpRes Healthcare, Inc.; EHC
Management LLC; EHC Financial Services
LLC; Evergreen California Healthcare
LLC; Evergreen at Arvin LLC; Evergreen
at Bakersfield LLC; Evergreen at Lakeport
LLC; Evergreen at Heartwood LLC;
Evergreen at Springs Road LLC; Evergreen
at Tracy LLC; Evergreen at Oroville LLC;
Evergreen at Petaluma LLC; Evergreen at
Gridley (SNF) LLC; and DOES 1 through
100,

Defendants.

Case No. 4:10-cv-05839-CW

**STIPULATION AND ~~PROPOSED~~
ORDER RE REPLY TO OPPOSITION TO
MOTION FOR LEAVE TO AMEND
COMPLAINT AND MOTION TO DISMISS**

The Honorable Claudia Wilken

Pursuant to Civil Local Rules 6-2 and 7-12, the parties submit the following stipulation:

Whereas on November 21, 2011 Defendants filed an opposition to Plaintiffs' motion for leave to amend the complaint and motion to dismiss;

Whereas the Court held that Plaintiffs must file a response within seven days (Doc. #79);

Whereas November 24, 2011 is the Thanksgiving holiday;

Whereas no other scheduling modifications have been requested pertaining to Plaintiffs' amended complaint;

Whereas the Court has not yet set a hearing date for the motions or a case management conference;

NOW THEREFORE, it is stipulated that deadline for Plaintiffs to file a combined response to Defendants' opposition to motion for leave to amend, as well as Defendants' motion to dismiss, shall be December 6, 2011.

Dated: November 23, 2011

Respectfully submitted,

WROTEN & ASSOCIATES, INC.

By: /s/ Laura K. Sitar
Laura K. Sitar

WROTEN & ASSOCIATES, INC.
Kippy L. Wroten, State Bar No. 134325 2
E-Mail: kwroten@wrotenlaw.com
Laura K. Sitar, State Bar No. 195806
Mail: lsitar@wrotenlaw.com
Darryl A. Ross, State Bar No. 180022
E-Mail: dross@wrotenlaw.com
20 Pacifica, Suite 1100
Irvine, California 92618
Telephone: (949) 788-1790 6
Facsimile: (949) 788-1799

Attorneys for Defendants

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Robert J. Nelson
Robert J. Nelson

Robert J. Nelson (State Bar No. 132797)
Lexi Hazam (State Bar No. 224457)
Andrew Kingsdale (State Bar No. 255669)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
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Callahan, CA 96014-1568
Telephone: (530) 467-5307
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Kathryn A. Stebner (State Bar No. 121088)
Sarah Colby (State Bar No. 194475)
STEBNER & ASSOCIATES
870 Market Street, Suite 1212
San Francisco, CA 94102-2907
Telephone: (415) 362-9800
Facsimile: (415) 362-9801

Christopher J. Healey (State Bar No. 105798)
LUCE, FORWARD, HAMILTON & SCRIPPS LLP
600 West Broadway, Suite 2600
San Diego, CA 92101

W. Timothy Needham (State Bar No. 96542)
Michael J. Crowley (State Bar No. 102343)
JANSSEN, MALLOY, NEEDHAM, MORRISON,
REINHOLTSEN & CROWLEY, LLP
730 Fifth Street
Eureka, CA 95501

Robert S. Arns (State Bar No. 65071)
Steven R. Weinmann (State Bar No. 190956)
THE ARNS LAW FIRM
515 Folsom Street, 3rd Floor
San Francisco, CA 94105

Attorneys for Plaintiffs

1 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the
2 filing of this document has been obtained from Laura K. Sitar.

3
4 **~~PROPOSED~~ ORDER**

5 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

6 Dated: 12/1/2011

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HON. CLAUDIA WILKEN